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Attorneys for MAP Enterprises, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN RE:	§	
	§	
MCCLAIN FEED YARD, INC., <i>et al.</i> , <sup>1</sup>	§	Case No. 23-20084-RLJ-7
	§	
Debtors.	§	Jointly Administered

**MAP ENTERPRISE, INC.'S (I) LIMITED  
OBJECTION TO THE TRUSTEE'S MOTION FOR 2004 EXAMINATION AND  
(II) JOINDER TO OBJECTIONS TO THE TRUSTEE'S MOTION FOR 2004 EXAMINATION<sup>2</sup>**

MAP Enterprise, Inc. ("**MAP**"), by and through its undersigned counsel, files this *MAP Enterprise, Inc.'s (I) Limited Objection to the Trustee's Motion for 2004 Examination and (II) Joinder to Objections to the Trustee's Motion for 2004 Examination* (the "**Objection**") to the *Trustee's Motion for Rule 2004 Examination of USDA Dealer Trust Claimants* [Docket No. 174] (the "**Motion**")<sup>3</sup> filed by the Chapter 7 trustee (the "**Trustee**") for the above-captioned debtor (the "**Debtor**"). In support of the Objection, MAP respectfully states the following:

MAP does not generally oppose the Trustee conducting a discovery process that seeks to obtain information for the efficient administration of the Debtor's Chapter 7 estate. MAP, however, shares many of the same concerns lodged by other parties-in-interest that have filed

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<sup>1</sup> The Debtors in these Chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ).

<sup>2</sup> Attorney for the Trustee, Hudson M. Jobe, and attorney for MAP, Harrison A. Pavlasek, communicated on March 4, 2024. During that correspondence, Mr. Jobe indicated to Mr. Pavlasek that MAP could have a one-day extension to file this Objection.

<sup>3</sup> Capitalized terms used herein but not otherwise defined shall have the meaning given to them in the Motion.

objections at Docket Nos. 185, 186, 187, and 188. Accordingly, MAP joins those parties in their objections to the Motion. Particularly, the Motion should be denied or amended to ensure that the requests for production and the interrogatory contained in the Discovery Request are not overly broad, unlimited in time, and unduly burdensome. Further, the parties should have the ability to raise objections to the discovery sought per the Federal Rules of Civil Procedure.

WHEREFORE, MAP prays that the Court deny the Motion to the extent set forth herein and grant to MAP such other relief as is just and proper.

Dated: March 5, 2024.

/s/ Harrison A. Pavlasek

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*Attorneys for MAP Enterprises, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2024, a true and correct copy of the foregoing document was served via the Court's CM/ECF system.

/s/ Harrison A. Pavlasek

Harrison A. Pavlasek